

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

IN RE:

W.R. GRACE & CO., et al.,
Debtors.

Chapter 11

**Case No. 01-01139(JFK)
(Jointly Administered)**

Objection Deadline: August 4, 2006 @ 4:00

Hearing Date: September 11, 2006

Ref. Docket No. 12823

**CLAIMANTS REPRESENTED BY ODOM & ELLIOTT, P.A.'S
RESPONSE TO MOTION TO COMPEL FILED BY THE DEBTORS**

Comes now Claimants represented by Odom & Elliott, P.A., and for their response to the Debtors' Motion to Compel states and alleges as follows:

1. Odom & Elliott, P.A. represents potential claimants in the Debtors' bankruptcy.
2. Odom & Elliott, P.A. was served with questionnaires pursuant to orders of the Court. The purpose of these questionnaires is allegedly to assist the debtor in quantifying its potential asbestos liabilities.
3. Odom & Elliott has served its responses to these questionnaires on the debtors in the time and manner allowed by the Court.
4. Odom & Elliott's clients have responded to the questionnaires in one or more ways that the debtors considers objectionable and outside of the scope of what the Court has ordered.
5. Odom & Elliott was served with a copy of a motion to compel filed by the debtor seeking, *inter alia*, to compel Odom & Elliott's clients to answer each question in a narrative form and to prohibit Odom & Elliott's clients from objecting to questions and supplying documents in response to certain questions.

6. Odom & Elliott's clients have associated the law firm of Motley Rice LLC on these cases, and Odom & Elliott adopts in whole the response to the debtors' motion to compel that has been filed by Motley Rice LLC (Docket No. 12927).

WHEREFORE, PREMISES CONSIDERED, Odom & Elliott and its clients hereby request that the debtors' motion to compel be denied.

Respectfully submitted,

/s/ Russell B. Winburn

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Date: August 4, 2006